## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA	) Criminal No.	5:18-CR- <u></u> (FJS_)
<b>v.</b>	) Indictment	
SHAQUILLE BRELAND (aka "SHAQ"), and GEORVAN HARRIS (aka "BOOMER"),	<ul><li>) Violations:</li><li>)</li><li>)</li><li>)</li><li>)</li><li>)</li><li>)</li></ul>	18 U.S.C. § 1513(f) [Conspiracy to Retaliate]; and 18 U.S.C. § 924(c)(1)(A) [Using Firearm During and In Relation to a Crime of Violence]
	) 2 Counts	
Defendants.	) County of Off	ense: Onondaga

## **THE GRAND JURY CHARGES:**

## COUNT 1 [Conspiracy to Retaliate]

On or about December 9, 2017, in the Northern District of New York, the defendants, SHAQUILLE BRELAND (aka "SHAQ") and GEORVAN HARRIS (aka "BOOMER"), conspired to (1) attempt to kill a person with the intent to retaliate against a person for providing to a law enforcement officer information relating to the commission of a Federal offense, in violation of Title 18, United States Code, Section 1513(a)(1)(B) and (2) threaten to cause bodily harm and damage the tangible property of a person with the intent to retaliate against a person for information relating to the commission of a federal offense given by a person to a law enforcement officer, in violation of Title 18, United States Code, Section 1513(b)(2).

In furtherance of the conspiracy, the defendants SHAQUILLE BRELAND (aka "SHAQ") and GEORVAN HARRIS (aka "BOOMER") took the following overt acts:

1. SHAQUILLE BRELAND (aka "SHAQ") chased a sedan on foot;

2. SHAQUILLE BRELAND (aka "SHAQ") and GEORVAN HARRIS (aka "BOOMER") chased that sedan in a sport utility vehicle driven by GEORVAN HARRIS (aka "BOOMER") with SHAQUILLE BRELAND (aka "SHAQ") as a

passenger and fired shots at the sedan using a 9 mm pistol.

All in violation of Title 18, United States Code, Section 1513(f).

**COUNT 2** 

[Using and Carrying Firearm During and In Relation to a Crime of Violence]

On or about December 9, 2017 in the Northern District of New York, the defendant, SHAQUILLE BRELAND (aka "SHAQ"), during and in relation to a crime of violence, for which he may be prosecuted in a court of the United States, that is Conspiracy to Retaliate, in violation of Title 18, United States Code, Section 1513(f), knowingly used and carried a firearm, that is, a 9 millimeter pistol, in violation of Title 18, United States Code, Section 924(c)(1)(A).

That firearm was discharged, in violation of Title 18, United States Code, Section

924(c)(1)(A)(iii).

Dated: January 11, 2018

A TRUE BILL, \*\*NAME REDACTED

Grand Jury Foreperson

GRANT C. JAQUITH United States Attorney

By:

Nicolas Commandeur
Assistant United States Attorney

Bar Roll No. 518984